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SOUTHWEST GAS CORPORATION

DEPT. OF TRANSPORTATION
DOCKETS

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November 3, 2000

DOT Dockets Unit, Plaza 401
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, DC 20590-0001

RE: Extension of Existing Information Collection: Comment Request
National Pipeline Mapping System, Docket No. RSPA-98-4957 - 32

Dear Sir or Madam:

Southwest Gas Corporation (Southwest) is a natural gas company located in Arizona, California and Nevada. Southwest owns and operates approximately 1,434 miles of transmission pipelines.

Southwest supports the efforts of the Research and Special Programs Administration (RSPA) to improve pipeline safety through information collection and data accessibility.

RSPA requested comments from natural gas pipeline operators on the four following areas described below. Southwest respectfully submits the following comments on the proposed collection of information:

RSPA Request (a):

The need for the proposed collection of information for the proper performance of the functions of the agency, including whether the information will have practical utility.

Southwest's Comments (a):

Southwest does not agree with the need for the proposed collection of information for the proper performance of the functions of the agency, nor does Southwest believe that the information will have practical utility. Southwest currently makes pipeline facility information available to individuals requesting such data for their specific situations and will continue to do so to satisfy the public's right to know. The global accessibility of pipeline facility information raises concerns of security issues.



Information pertaining to pipeline facility location as a whole should be maintained at a state level, rather than federal, where it will have more practical utility.

RSPA Request (b):

The accuracy of the agency's estimate of the burden of the proposed collection of information including the validity of the methodology and assumptions used.

Southwest's Comments (b):

Southwest believes that the number of man-hours for each operator to provide submission to the NPMS was greatly underestimated. Even under the most optimum conditions, a supplemental submission of any size would take anywhere from 100 to 1000 hours to prepare satisfactorily. One reason for this is the burden to specifically track pipeline segment revisions, such as additions, relocations and abandonments, from one submission to the next.

RSPA Request (c):

Suggestions for ways to enhance the quality, utility and clarity of the information to be collected.

Southwest's Comments (c):

There are several ways to enhance the quality, utility and clarity of the information to be collected. Each comes with increased cost and increased man-hours dedicated to the data collection process. For example, to more accurately map their facilities operators could use the global-positioning satellite (GPS), but the costs far outweigh the tangible benefits.

RSPA Request (d):

Suggestions for ways to minimize the burden of the collection of information on those who are to respond, including the use of appropriate automated, electronic, mechanical or other technological collection techniques.



DOT Dockets Unit, Plaza 401
Page Three
November 3, 2000

Southwest's Comments (d):

One way to minimize the burden of collecting data for submission to the NPMS would be to research some detailed examples of various submission processes that would be used by the operators. Some case studies could be prepared outlining the steps required to accomplish a manual, automated geographic information system or electronic submission. This would provide potential insight and different perspectives to the operators. It will also allow the NPMS staff to better understand what the operators will have to go through to produce submissions that conform to the standards.

Southwest appreciates this opportunity to participate and provide comments on this information collection process proposal. Southwest supports efforts that improve upon processes and pipeline safety provided that they consider practicality and cost effectiveness when implementing standards related to information collection requirements. If you have any questions or would like to discuss this information further, please contact Anita Romero at (702) 364-3263.

Sincerely,

John Clayton
Manager/Compliance/Engineering Staff

c R. Clarillos
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